

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

NEERAJ DUDHWALA,	:
	:
<i>Plaintiff,</i>	:
	:
v.	:
	:
CHOICE HOTELS INTERNATIONAL SERVICES CORPORATION D/B/A CHOICE HOTELS, and JOHN DOES I-X (being a number yet undetermined and being persons or corporations, whose identities are unknown),	: CIVIL ACTION : NO. 8:22-cv-02399-PX
	:
<i>Defendants.</i>	:
	:

INITIAL JOINT STATUS REPORT

Plaintiff Neerav Dudhwala (“Plaintiff”) and Defendant Choice Hotels International Services Corp. (“Defendant”), by and through their counsel, submit this Initial Joint Status Report as required by the Court’s Scheduling Order, dated November 13, 2023 [ECF No. 65] (the “Scheduling Order”), and jointly state as follows:

I. Requests for Modification of the Scheduling Order

The Court’s Scheduling Order contains the following unexpired deadlines:

December 28, 2023	Moving for joinder of additional parties and amendment of pleadings
January 12, 2024	Plaintiff’s Rule 26(a)(2) disclosures
February 12, 2024	Defendant’s Rule 26(a)(2) disclosures
February 26, 2024	Plaintiff’s rebuttal Rule 26(a)(2) disclosures
March 4, 2024	Rule 26(e) supplementation of disclosures and responses
March 27, 2024	Discovery deadline; submission of status report

April 3, 2024	Requests for admission
April 26, 2024	Dispositive pretrial motions deadline

The parties have conferred and agree to propose the following modifications to the Scheduling Order:

December 28, 2023	Moving for joinder of additional parties and amendment of pleadings
April 11, 2024	Plaintiff's Rule 26(a)(2) disclosures
May 13, 2024	Defendant's Rule 26(a)(2) disclosures
May 27, 2024	Plaintiff's rebuttal Rule 26(a)(2) disclosures
June 3, 2024	Rule 26(e) supplementation of disclosures and responses
June 25, 2024	Discovery deadline; submission of status report
July 2, 2024	Requests for admission
July 25, 2024	Dispositive pretrial motions deadline

II. Early Settlement/ADR Conference

The parties have engaged in limited settlement discussions; to date, they have been unsuccessful. At this time, while Plaintiff is always amenable to settlement discussions, the parties agree that the exchange of some initial discovery would be beneficial prior to any formal settlement conference with a United States Magistrate Judge.

III. Deposition Hours

The Court's Scheduling Order allocates 15 hours of depositions of fact witnesses (including parties) per side, for a total of 30 hours of fact witness depositions. The parties have conferred.

Defendant believes 15 hours of depositions of fact witnesses is sufficient for each side, and sees no basis for extending the time allotted by the Court in this straightforward, single-plaintiff discrimination action.

Plaintiff believes he requires more time than is allotted by the Court, and therefore requests a total of 25 hours of depositions for Plaintiff's fact witnesses, due to the anticipated number of fact witnesses to be deposed.

IV. United States Magistrate Judge

At this time, the parties do not unanimously consent to proceed before a United States Magistrate Judge.

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Dated: November 27, 2023

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Dated: November 27, 2023